



Department of Energy

Idaho Operations Office
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Idaho Falls, Idaho 83401-1563

April 20, 1998

CHG
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U.S. Department of the Treasury
Cynthia L. Johnson, Director, Cash Management Policy and Planning Division
Financial Management Service
401 14th Street, SW, Room 420
Washington, DC 20227

SUBJECT: Notice of Proposed Rulemaking – ACH (CF&AO-FSD-RLR-98-067)

Dear Ms. Johnson:

Thank you for the opportunity to review the Notice of Proposed Rulemaking (NPRM) which revises the regulations governing the use of the Automated Clearing House (ACH) system by Federal Agencies. In general, we agree with the proposed rulemaking, but the rules provide few exceptions to their application, which may at times be a burden for the Agency. We recommend the Treasury consider a case-by-case exception for transactions where compliance with the rules would create an unreasonable burden on the Agency. An example of this would be – resolution of lawsuits, agreements, etc., that require the signature of the person before releasing the funds.

The area most challenging to us is dealing with payments to and from Department of Defense (DOD). Some DOD payment centers have no knowledge of the On Line Payment and Collection System (OPAC); therefore, all payments are currently processed by check. Other DOD payment centers have OPAC capability, but are hesitant to use it.

If you have any questions, please contact Rebecca Rich on (208) 526-1306 or by e-mail at richrl@inel.gov.

Sincerely,

Katherine A. Vivian, Director
Financial Services Division

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